

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

DEBORAH BELLE,  
individually, and on behalf  
of all others similarly situated,

Plaintiffs,

v.

NO. L 02 CV 3309

NCO FINANCIAL SYSTEMS, INC.,  
a Pennsylvania Corporation

and

JOHN DOE

Defendants.

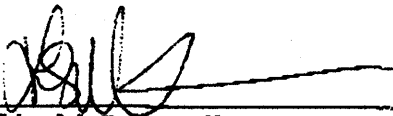
**AFFIDAVIT OF LISA M. RAIMONDI**

I, Lisa M. Raimondi, being duly sworn on oath, depose and state that I am one of attorneys representing the Plaintiff in the above-referenced case and I have first hand knowledge of the following facts and could competently swear thereto if called to testify in a court of law:

1. On May 23, 2003, our office served written discovery on counsel for NCO Financial Systems, Inc. ("NCO").
2. On August 4, 2004, a Joint Status Report was submitted to the Court that set forth the parties' discovery schedule.
3. The Joint Status Report required NCO to answer the May 23, 2003, discovery prior to September 5, 2003. It also stated that oral discovery should be completed by November 4, 2003.
4. Although NCO attempted to serve our office with their responses on September 9, 2003, because they were mailed to an incorrect address, our office did not receive NCO's responses until after September 29, 2003.

5. At the time NCO submitted these responses, it withheld certain documents claiming them to be privileged and confidential and requested that our office sign a protective order.
6. After negotiating the language of the protective order, our office executed the protective order on October 13, 2003. Our office did not receive the remainder of NCO's documents subject to the protective order until October 30, 2003.
7. Because this only allowed us four (4) days to complete oral discovery pursuant to the Joint Status Report, our office requested an extension.

DATED: April 15, 2004

  
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Lisa M. Raimondi

STATE OF ILLINOIS       )  
                                      ) SS  
COUNTY OF COOK       )

Subscribe and sworn to before  
me this 15th day of April, 2004.

  
Notary Public

